

**Remarks**

Claims 1-24 are pending in the application. Claims 1-4 have been withdrawn from consideration pursuant to a restriction requirement by the Examiner. Claim 25 has been canceled. Claims 5-24 stand finally rejected.

Claims 5-8 were rejected under 35 USC 102(e) as being anticipated by Yamashiroya (US 6,470,425). The Applicant respectfully traverses.

Yamashiroya cannot support the asserted rejection for at least the reason that it is completely silent regarding building and storing instruction segments from an output of a segment builder, as required by claim 5. The Examiner appears to equate the hit threshold register 461 of Yamashiroya to the latter claim feature. The Applicant respectfully disagrees. Yamashiroya's hit threshold register bears no resemblance at all to the claimed segment builder.

Yamashiroya's hit threshold register is simply a counter. See the sentence bridging columns 3 and 4: "The hit threshold register 461 contains the number of sequential cache hits that is used as an update inhibition condition for a cache memory entry." An instruction segment builder is clearly something entirely different, as is evident simply by its name; i.e., an instruction segment builder builds instruction segments.

Accordingly, claim 5 is clearly allowable over Yamashiroya. Moreover, since they include the recitations of claim 5 by dependence thereon, claims 6-8 are similarly allowable over claim 5 for at least the reasons discussed in connection with claim 5. Withdrawal of the rejection of claims 5-8 as anticipated by Yamashiroya is therefore respectfully requested.

Claims 9 and 10 were rejected under 35 USC 103(a) as being unpatentable over Yamashiroya in view of Chauvel et al. (US 6,681,297) ("Chauvel"). Claims 9 and 10 depend on claim 5 and therefore include its features. Claim 5 has been demonstrated to be allowable over Yamashiroya as discussed above. Chauvel does not remedy deficiencies in Yamashiroya with respect to claim 5, for at least the reason that Chauvel, like Yamashiroya,

contains no suggestion of building and storing instruction segments from an output of a segment builder. Withdrawal of the rejection of claims 9 and 10 is therefore respectfully requested.

Claims 11-25 were rejected under 35 USC 103(a) as being unpatentable over Miyazaki (US 6,385,697) in view of Chauvel. The Applicant respectfully traverses.

Independent claims 11 and 16 are allowable over Miyazaki and Chauvel for at least the reason that these references do not suggest a threshold comparator as recited in claims 11 and 16. Element 32 of Miyazaki, alleged by the Examiner to be equivalent to the claimed comparator, is simply an OR gate that indicates whether a hit or a miss occurred in a cache line of a direct mapping cache table TB. See Miyazaki at col. 14, lines 42-45. Chauvel does not cure the deficiency in Miyazaki. Claims 11 and 16 are therefore allowable over Miyazaki and Chauvel. Moreover, since they include the recitations of one of claims 11 or 16 by dependency thereon, claims 12-15 and 17-20 are similarly allowable over Miyazaki and Chauvel, for at least the reasons discussed in connection with claims 11 and 16. Withdrawal of the rejection of claims 11-20 is therefore respectfully requested.

Discussion turns now to independent claim 21. Claim 21 is allowable over Miyazaki and Chauvel for at least the reason that Miyazaki and Chauvel in no way suggest "[a]n access filter ... wherein an output of the tag comparator enables an instruction segment builder" as recited. The Examiner cites Miyazaki's abstract as disclosing this feature. The Applicant respectfully disagrees. Miyazaki's abstract relates to an arrangement for managing two data caches, but contains no mention of enabling an instruction segment builder. Chauvel is similarly silent as to the noted feature. Accordingly, withdrawal of the rejection of claim 21, and of claims 22-24 dependent thereon, is respectfully requested.

In light of the above discussion, Applicant respectfully submits that the present application is in all aspects in allowable condition, and earnestly solicits favorable reconsideration and early issuance of a Notice of Allowance.

The Examiner is invited to contact the undersigned at (202) 220-4323 to discuss any matter concerning this application. The Office is authorized to charge any fees related to this communication to Deposit Account No. 11-0600.

Respectfully submitted,

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